



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203

December 28, 2005

The Honorable Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington D.C. 20554

Re: Petition of the Washington Utilities and Transportation Commission for
Mandatory Number Pooling

Dear Secretary Dortch:

Enclosed is an original and four copies of the Petition of the Washington State Utilities
and Transportation Commission for filing with the Federal Communications
Commission.

Should you have any questions concerning this document, please contact Lisa Steel at
(360) 664-1303.

Sincerely,

Carole J. Washburn
Executive Secretary

Enclosures



**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

**Thousands-Block Pooling Administrator
Technical Requirements**

CC Docket No. 99-200

DA No. 05-3102

December, 2005

**COMMENTS OF THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

Mark H. Sidran,
Chairman

Patrick J. Oshie,
Commissioner

Philip B. Jones,
Commissioner

Washington Utilities and
Transportation Commission
P.O. Box 7250
1300 S. Evergreen Park Dr., SW
Olympia, WA 98504-7250
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I. INTRODUCTION

In its March 31, 2000, Report and Order and Further Notice of Proposed Rulemaking on Numbering Resource Optimization (NRO Order),¹ the Federal Communications Commission (Commission) directed the North American Numbering Council (NANC) to propose revisions to the technical requirements document drafted by the NANC for the thousands-block Pooling Administrator (PA).²

The Wireline Competition Bureau (Bureau) must select a national thousands-block PA for another contract term. At request of the Commission's Wireline Competition Bureau, the NANC examined and proposed revisions to the existing PA technical requirements document. The NANC forwarded its proposed technical requirements to the Chief of the Bureau on August 3, 2005. The Commission seeks comment on the technical requirements recommended by the NANC. The Washington Utilities and Transportation Commission respectfully submits these comments regarding the duties and scope of the PA's responsibilities.

¹ Numbering Resource Optimization, *Report and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 99-200, 15 FCC Rcd 7574 (2000) (NRO Order).

² NRO Order, 15 FCC Rcd at 7643, para. 155.

II. BACKGROUND

Currently, the Pooling Administrator (PA) is allowed to exercise a certain amount of judgment when determining how many blocks are necessary for an individual wire center pool in order to meet the forecasted demand.³ The PA does not automatically open new NXX codes for the sole purpose of filling the pool for a rate center based only on service provider forecasts. Instead, the PA reviews the service provider forecasts but also considers the history of the particular rate center and/or the historical accuracy of the forecasts of a particular provider before opening a new NXX.

Under the proposed Requirements, the PA will be required to rely solely upon forecasted demand when determining the appropriate pool level for each wire center. The PA will not exercise independent judgment or consideration of actual utilization rates, historical take rates and other factors.

III. DISCUSSION

The new requirements would result in the premature assignment of numbering resources to a particular wire center and the premature exhaust of both

NPAAs and the North American Numbering Plan (NANP). Premature exhaust of NPAAs would cause Washington State consumers to incur expenses related to a new NPA, including region-wide mandatory ten-digit dialing. Conservation of numbers is important to ensure that numbers are available for important public purposes, such as pseudo automatic number identification for 911 (pANI) and the availability of emergency routing.

Many carriers do not have the incentives to take forecasting obligations seriously. Companies continue to forecast based on marketing rather than a historical base. Some companies apparently have so many codes in their six month reserve that they do not request numbers from either the North American Number Plan Administrator or the Pooling Administrator (PA) and thus ignore the biannual numbering forecasts. Efficient number usage is not tracked by either federal or state jurisdictions because not all carriers complete the numbering forecasts, and because there is no required link between the forecast and actual usage patterns. Finally, NPA exhaust forecasts do not take into account one-thousand number blocks available in rate centers, relying instead only on the ten-thousand number codes available in a NPA.

³ Section J; Thousands-Block Pooling Contractor Technical Requirements (November 30, 2000)

Thousands-block number pooling is an alternative method for the assignment of numbering resources. Instead of assigning all 10,000 numbers within an NXX code to a single service provider, thousands-block pooling involves the allocation of telephone numbers within an NXX code in blocks of a thousand sequential numbers to different service providers in a particular rate area. In order to optimize the number conservation benefits of thousands-block pooling, the Commission should retain the existing requirements that allow the PA to exercise discretion in assigning numbering resources to a particular rate center.

IV. CONCLUSION

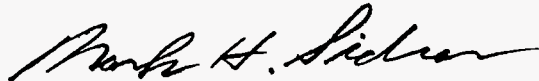
The Commission should modify section 2.14.1 of the Thousand Block Pooling Administrator Technical Requirements to remove the obligation of the Pooling Administrator (PA) to rely solely upon forecasted demand when determining the level of resources need in a particular wire center pool. At a minimum, the Commission should retain the existing requirements in sections 2.11 and 2.11.1 that allow the PA to analyze the forecast data in order to determine the appropriate level of resources. The Commission should consider strengthening those requirements to

require the PA to consider, in addition to forecast data, actual utilization data,
historical take rates and other relevant factors prior to the assignment of resources.

DATED at Olympia, Washington and effective this 28th day of December,
2005.

Respectfully submitted,

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION



MARK H. SIDRAN, Chairman



PATRICK J. OSHIE, Commissioner